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NORTHERN DIST. OF TX
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ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

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UNITED STATES OF AMERICA

V.

AMECHI COLVIS AMUEGBUNAM (1)

NO. 3:15-CR-411-K

(Supersedes Indictment returned on
September 23, 2015)

SUPERSEDING INFORMATION

The United States Attorney charges:

COUNT ONE

Conspiracy to Commit Wire Fraud
(18 U.S.C. § 371 (18 U.S.C. § 1343))

From in or about November 2013, through in or about August 2015, in the Dallas Division of the Northern District of Texas and elsewhere, defendant **Amechi Colvis Amuegbunam**, did knowingly and willfully combine, conspire, confederate, and agree with other individuals known and unknown, to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, and for the purpose of executing the scheme and artifice to defraud, transmitted and caused to be transmitted by means of wire communication in interstate and foreign commerce, any writings, signs, signals, pictures, and sounds in violation of 18 U.S.C. § 1343, in that **Amuegbunam** and other individuals known and unknown to the Grand Jury sent and caused to be sent fraudulent e-mails to companies in the Northern District of Texas and elsewhere, said e-mails constituting and containing

material misrepresentations that caused the companies to wire transfer funds as instructed on a pdf document attached to the e-mail.

Manner and Means of the Conspiracy and the Joint Scheme and Artifice to Defraud

1. The purpose of the conspiracy and joint scheme and artifice to defraud was to cause companies to wire transfer funds to bank account controlled by certain coconspirators based on a fraudulent email directing the wire transfer according to wiring instructions on a pdf document attached to the fraudulent email.
2. It was part of the aforesaid conspiracy and joint scheme and artifice that the coconspirators knowingly and intentionally engaged in the following:
 - (a) researched various corporations (victim corporation) to determine the names and email addresses of specific corporate executives and corporate accounts payable personnel (controller);
 - (b) registered domain names (spoofed domains) almost identical to the victim corporations' domain names (often the spoofed domain transposed two letters);
 - (c) set up email accounts in the real names of the corporate executives using the spoofed domains;
 - (d) created or cause another to create fraudulent companies;
 - (e) set up or caused another to set up bank accounts (sham accounts) in the names of the fraudulent companies in the United States and outside the United States to receive the wire transfer or to further transfer the funds;
 - (f) created pdf documents bearing wiring instructions to the sham accounts;

- (g) created fake emails or fake email chains involving one or more of the corporate executives pretending to discuss moneys owed by the victim corporation to the fraudulent company;
- (h) sent emails from the spoofed domains which incorporated the fake emails or fake email chains to the corporate controllers, directing them to wire transfer funds according to the instructions on the attached pdf document;
- (i) transferred a portion of the funds or caused another to transfer a portion of the funds to bank accounts in Nigeria, and thereafter divide the proceeds among the coconspirators.

Overt Acts

1. In furtherance of the conspiracy and joint scheme and artifice to defraud and in order to effect the objects thereof, defendant **Amechi Colvis Amuegbunam** and his coconspirators committed and caused to be committed the following overt acts, among others, in the Northern District of Texas, and elsewhere:
 - (a) On or about November 5, 2013, defendant **Amechi Colvis Amuegbunam** and his coconspirators created a PDF document titled CFC CLEANING & SECURITY SERVICE LIMITED WIRE INSTRUCTIONS.PDF bearing wiring instructions to a bank in London, UK.
 - (b) On or about November 6, 2013, defendant **Amechi Colvis Amuegbunam** and his coconspirators registered approximately thirty spoofed domains, including a domain spoofing Victim Company A's domain.

- (c) On or about November 6, 2013, defendant **Amechi Colvis Amuegbunam** and his coconspirators sent an email from the spoofed domain to Victim Company A's corporate controller pretending to be from a corporate executive at Victim Company A, instructing the controller to wire transfer \$98,550.00 pursuant to the attached PDF document titled CFC CLEANING & SECURITY SERVICE LIMITED WIRE INSTRUCTIONS.PDF.
- (d) On or about November 6, 2013, defendant **Amechi Colvis Amuegbunam** and his coconspirators caused Victim Company A's corporate controller to wire transfer \$98,550.00 from Victim Company A's bank account in the Northern District of Texas to a bank in London, UK.
- (e) On or about May 15, 2014, defendant **Amechi Colvis Amuegbunam** and his coconspirators created a PDF document titled GREEN EMPIRE VENTURES WIRE INSTRUCTIONS.PDF bearing wiring instructions to a bank in Hong Kong.
- (f) On or about May 16, 2014, **Amechi Colvis Amuegbunam** and his coconspirators registered approximately six spoofed domains, including a domain spoofing Victim Company B's domain.
- (g) On or about May 16, 2014, defendant **Amechi Colvis Amuegbunam** and his coconspirators sent an email from the spoofed domain to Victim Company B's corporate controller pretending to be from a corporate executive at Victim Company B, instructing the controller to wire transfer \$370,455.12 to pursuant to the attached PDF document titled GREEN EMPIRE VENTURES WIRE INSTRUCTIONS.PDF.
- (h) On or about May 16, 2014, defendant **Amechi Colvis Amuegbunam** and his coconspirators caused Victim Company B's corporate controller to wire transfer

\$370,455.12 from Victim Company B's bank account in the Northern District of Texas to a bank in Hong Kong.

(i) On or about May 17, 2014, defendant **Amechi Colvis Amuegbunam** and his coconspirators canceled the domain spoofing Victim Company B's domain.

(j) On or about May 19, 2014, defendant **Amechi Colvis Amuegbunam** and his coconspirators created a PDF document titled APEX BASIC LTD WIRE INSTRUCTIONS.PDF bearing wiring instructions to a bank in Hong Kong.

(k) On or about May 19, 2014, defendant **Amechi Colvis Amuegbunam** and his coconspirators registered a total of eight domains and reregistered the domain spoofing Victim Company B's domain.

(l) On or about May 19, 2014, defendant **Amechi Colvis Amuegbunam** and his coconspirators sent an email from the reregistered spoofed domain to Victim Company B's corporate controller pretending to be from a corporate executive at Victim Company B, instructing the controller to wire transfer \$274,309.12 to pursuant to the attached PDF document titled APEX BASIC LTD WIRE INSTRUCTIONS.PDF.

In violation of 18 U.S.C. § 371 (18 U.S.C. § 1343).

JOHN R. PARKER

UNITED STATES ATTORNEY

A handwritten signature in black ink, appearing to read 'Candina S. Heath', is written over a horizontal line.

CANDINA S. HEATH

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Northern District of Texas

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